

ORIGINAL

DOCKET FILE COPY ORIGINAL RECEIVED

NOV 23 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Implementation of Sections 3(n) and)
332 of the Communications Act)

Regulatory Treatment of Mobile Services)

GN Docket No. 93-252

REPLY COMMENTS

MCI Telecommunications Corporation (MCI), by its attorneys,
hereby submits its reply comments in the above-captioned proceed-
ing.

I. Introduction

Initial comments in response to the Commission's Notice of
Proposed Rulemaking (Notice) were filed by over seventy parties,
representing a broad range of interests. The majority of com-
menters advocated interpretations of Sections 3(n) and 332 of the
Act consistent with the intent of Congress to achieve regulatory
parity for all commercial mobile services.^{1/} The comments pro-
vide a sound foundation for the adoption of rules and policies
which will bring all commercial mobile services under a system of
fair and reasonably uniform federal regulation.

In these reply comments, MCI will briefly address several
issues related to interconnection rights and obligations of CMS
providers. Although the "right to interconnection" was listed
among "other issues" in the Notice, it is clear that many exist-

^{1/} See, e.g., Bell Atlantic at 4-14; CTIA at 3-25, D.C. PSC at 2-
8, GCI at 1-2, NARUC at 12-20, New Par at 6-7; NYDPS at 3-8.

No. of Copies rec'd
List ABCDE

244

ing and prospective providers of commercial mobile services share MCI's belief^{2/} that interconnection, in the form of co-carrier status with LECs, is of vital importance to PCS and similar services.

II. Discussion

A. Co-carrier Status.

The Commission's proposal^{3/} to grant all commercial mobile service providers the interconnection rights currently granted to Part 22 common carriers, including the right to mutual compensation from local exchange carriers (LECs) received broad support^{4/} and no discernible opposition.

MCI agrees with those commenters who have urged the Commission to go beyond a simple extension of existing cellular interconnection policies to all Commercial Mobile Services (CMS), and to take a more active and aggressive role in implementing existing policies and expanding them as necessary to accommodate changes in technology. For example, Cox stated:

As the Commission is aware, despite its best efforts in declaring cellular carriers as co-carriers in the local exchange and directing LECs to negotiate in good faith for fair and reasonable interconnection, cellular carriers have been unable to achieve co-carrier status and have not received the co-carrier compensation from LECs that the Commission's policies plainly require. Accordingly, extension of the cellular status quo to all CMS would be inadequate to ensure that LECs provide

^{2/} MCI at 1-3, 8-9.

^{3/} Notice at ¶¶ 70-71.

^{4/} See, e.g., MCI at 1-3 and 8-9, Arch at 7, Century Cellunet at 7, Comcast at 10-12, Corporate Technology Partners at 2, Cox at 2-3, GCI at 4, GTE at 21, Time Warner at 7, U S West at 30.

cost based interconnection in a manner that permits radio based local competition to develop.^{5/}

Several parties urged the Commission to require mutual compensation:

Consistent with this position is the notion that while PCS operators will compensate LECs for access to the PSTN in order to terminate connections, LECs should be required to compensate PCS operators for calls made by LEC customers terminating on PCS networks. This has been the traditional policy governing relationships between LECs, and the Commission has applied this policy of mutual compensation to mobile radio common carrier services as well.^{6/}

Interconnection rights of CMS providers should not be limited to those LEC offerings offered to Part 22 carriers, but should include all types of interconnection reasonably necessary to provide commercial mobile services in the era of intelligent LEC networks:

[T]he same problems which have plagued cellular interconnection will plague PCS in the absence of stronger, more direct action by the Commission on PSTN interconnection. In fact, those problems will be even more exacerbated given the speed with which wireless technologies are developing and the direction towards more consumer choice; which in turn requires greater intelligence, integration and interaction among networks.^{7/}

B. "Private Carriage," CMS and Interconnection.

Only a handful of parties addressed the Commission's proposal^{8/} that all PCS providers, whether they are classified as "commercial or private mobile service providers," should be given

^{5/} Cox at 2-3.

^{6/} Time Warner at 8. See also Comcast at 10 n. 12, GCI at 4-5.

^{7/} Comcast at 8.

^{8/} Notice at ¶ 73.

the same federally protected right to interconnect with LEC facilities.^{9/} MCI urges the Commission to carefully examine the basis of its authority to order interconnection, rather than assume that it has broad authority to order "private mobile service providers" to interconnect with common carriers and vice versa.

The Commission's authority to order interconnection derives from Sections 201(a) and 332(c)(1)(B) of the Communications Act of 1934, as amended. Section 201(a) addresses interconnection between common carriers and 332(c)(1)(B) interconnection between carriers and commercial (i.e., not private) mobile service providers. Nothing in the Act expressly grants the Commission authority to order common carriers to interconnect with "private mobile service providers."^{10/}

The regulatory parity provisions appear to leave little, if any, room for "private carriers" in commercial mobile services. Indeed, it can be argued that Congress, by not expanding the scope of Section 201 (a) to extend "co-carrier" status to providers of "private mobile service," manifested its intent that providers of "private mobile services" have no greater intercon-

^{9/} See, e.g., AMTA at 20-21, CelPage et al. at 4-7.

^{10/} See, e.g., AllCity Paging at 2 n. 3:

Section 332(c)(1)(B) requires that only "common carriers" provide interconnection to commercial mobile service providers. Thus, if paging carriers are deemed to be private mobile service providers, they cannot be required to provide interconnection to other carriers.

See also BellSouth at 36.

nection rights than those of any end user.^{11/}

Time Warner^{12/} proposes that the Commission presume that all PCS offerings will be private mobile services unless a specific determination is made to the contrary. Inasmuch as Time Warner clearly contemplates that PCS will be both offered for profit and interconnected with the PSTN, only a patently erroneous interpretation of the statutory term "functionally equivalent" -- one that is wholly at odds with the objective of regulatory parity -- will yield the "private mobile service" classification it desires.

Even in the absence of any serious doubt as to the Commission's authority over "private mobile services" interconnection, MCI would hesitate to recommend that the Commission build a PCS regulatory structure on such an inadequate foundation as the "functional equivalence" exception. Accordingly, MCI urges the Commission to presume that all broadband PCS providers will, at least initially, operate as commercial mobile service providers, and require all applicants to demonstrate qualifications to hold a license in the common carrier service.

C. Other Issues Should Be Addressed In Separate Proceedings.

^{11/} Each of the cases cited in the Commission's discussion of this issue in n. 94 of the Notice deals with end user interconnection, not the co-carrier rights of "private carriers." While "end users" do enjoy federally protected interconnection rights, they are not entitled to the same rights (nor burdened by the same obligations) as "carriers." See, e.g., C.F. Communications Corp. v. Century Tel. et al., File No. E-89-170 (DA 93-1215) (Comm. Car. Bur., Oct. 14, 1993) and cases cited therein.

^{12/} Time Warner at 4 et seq.

Several commenters urge the Commission to resolve, in this proceeding, non-PCS issues which have some relationship to the broad topic of "regulatory parity" but which are best handled in other proceedings or, in the alternative, deferred "until after the conclusion of the initial phase of this rule making."^{13/} These issues include: possible repeal of the local exchange carrier eligibility restriction on SMR licensing,^{14/} removal of structural safeguards for cellular subsidiaries and affiliates of Bell Operating Companies,^{15/} self-designation of private status by cellular licensees,^{16/} and reclassification of cellular carriers as "non-dominant."^{17/}

Numerous parties submitted comments in response to the Commission's request for comment on whether "any or all classes of PCS providers should be subject to equal access obligations like those imposed on the LECs." The widely diverging views of

^{13/} Notice at ¶ 4 n. 6.

^{14/} See, e.g., Bell Atlantic at 19-20, BellSouth at 32-34.

^{15/} Ameritech at 4-9, Bell Atlantic at 35-39. NYNEX (at 22 n. 32) recommends that this issue be the subject of a separate rulemaking.

^{16/} McCaw at 12-14. As the CPUC suggests, a cellular licensee's "self-designated" change in status from "common carrier" to "private carrier" (even for a portion of its spectrum or services) may constitute a discontinuance of service or otherwise be subject to "market exit" rules necessitating prior regulatory approval under applicable law. CPUC at 3.

^{17/} GTE at 19-20.

the parties addressing this issue^{18/} suggest that cellular equal access should be the subject of a separate rulemaking, as initially requested by MCI in its Petition for Rulemaking, RM-8012, filed June 2, 1992.^{19/}

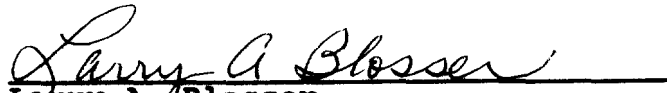
III. Conclusion

WHEREFORE, MCI requests that the Commission take its comments into account in reaching its decisions in this important telecommunications policy proceeding.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By:


Larry A. Blosser
Donald J. Elardo
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-2727

Its Attorneys

Dated: November 23, 1993

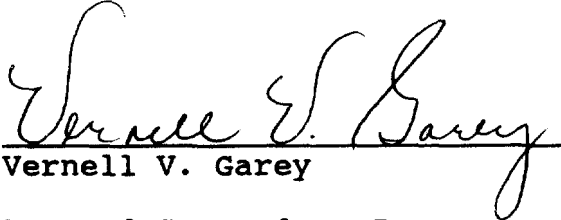
^{18/} The Bell Operating Companies, six of whom filed joint comments in opposition to MCI's Petition for Rulemaking, have reexamined their positions in light of AT&T's plans to acquire control of McCaw. See, e.g., Bell Atlantic at 30-35.

^{19/} See IVC Partnerships at 4, U S West at 35. The scope of the requested rulemaking should be expanded, in light of the recent legislation, to include consideration of whether equal access requirements should apply to other, non-cellular "commercial mobile services."

CERTIFICATE OF SERVICE

I Vernell V. Garey, hereby certify that on this 23rd day of November, 1993, copies of the foregoing "REPLY COMMENTS" in GN Docket No. 93-252 were served by first-class mail, postage prepaid upon the parties on list below, except as otherwise indicated.

***By Hand**


Vernell V. Garey

William F. Caton, Acting
Secretary*
Office of the Secretary
Federal Communications
Commission
Washington, D.C. 20554

John Cimko, Jr.*
Chief, Mobile Services Division
Common Carrier Bureau
Federal Communications
Commission
1919 M Street, N.W., Room 644
Washington, D.C. 20554

Ralph Haller*
Chief, Private Radio Bureau
Federal Communications
Commission
2025 M Street, N.W., Room 5202
Washington, D.C. 20554

International Transcription
Service*
1919 M Street, N.W., Room 214
Washington, D.C. 20554

Carl W. Northrop
Bryan Cave
Arch Communications Group, Inc.
Suite 700
700 13th Street, N.W.
Washington, D.C. 20005-3960

Raymond G. Bender, Jr.
Michael D. Basile
Steven F. Morris
Dow, Lohnes & Albertson
1255 Twenty-third Street, N.W.
Suite 500
Washington, D.C. 20037
Attorneys for Vanguard Cellular
Systems, Inc.

Phillip L. Spector
Susan E. Ryan
Paul, Weiss, Rifkind, Wharton &
Garrison
1615 L Street, N.W.
Suite 1300
Washington, D.C. 20036
Attorneys for Pagemart, Inc.

John D. Lane
Robert M. Gurss
Wilkes, Artis, Hendrick & Lane
Chartered
1666 K Street, N.W.
Washington, D.C. 20006
Attorneys for The Association
of Public-Safety Communications
Officials International, Inc.

Corwin D. Moore, Jr.
Administrative Coordinator
Personal Radio Steering Group
P.O. Box 2851
Ann Arbor, MI 48106

Kathy L. Shobert
Director, Federal Regulatory
Affairs
General Communications Inc.
888 16th Street, N.W.
Suite 600
Washington, D.C. 20006

Michael Hirsch
Vice President of External
Affairs
Geotek Industries, Inc.
1200 19th Street, N.W.
Suite 607
Washington, D.C. 20036

Thomas J. Keller
Michael S. Wroblewski
Verner, Liipfert, Bernhard.
McPherson and Hand, Chartered
901 15th Street, N.W.
Suite 700
Washington, D.C. 20005
Attorneys for The Association
of American Railroads

Thomas Gutierrez
Lukas, McGowan, Nace &
Gutierrez
1819 H Street, N.W.
Suite 700
Washington, D.C. 20006
Attorneys for Mobile
Telecommunication Technologies
Corp.

Anne P. Jones
David A. Gross
Kenneth G. Starling
Sutherland, Asbill &
Brennan
1275 Pennsylvania Ave, N.W.
Washington, D.C. 20004
Attorneys for PacTel
Corporation

Brian D. Kidney
Pamela J. Riley
Kathleen Abernathy
Pactel Corporation
2999 Oak Road, MS 1050
Walnut Creek, CA 94569

Frederick J. Day, Esq.
1110 N. Glebe Road, Suite 500
Arlington, VA 22201-5720
Attorney for Industrial
Telecommunications
Association, Inc.

Russell H. Fox
Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900, East Tower
Washington, D.C. 20005
Attorneys for The E.F. Johnson
Company, MPX Systems

Joel H. Levy
Cohn and Marks
1333 New Hampshire Avenue, N.W.
Suite 600
Washington, D.C. 20036
Attorney for National Cellular
Resellers Association

Shirley S. Fujimoto
Brian Turner Ashby
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
Attorneys for Lower Colorado
River Authority

C. Douglas Jarrett
Michael R. Bennet
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
Attorneys for RIG Telephones,
Inc.

Wayne V. Black
Tamara Y. Davis
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
Attorneys for The American
Petroleum Institute

Martin W. Bercovici
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
Attorney for Waterway
Communications System, Inc.

Frederick M. Joyce
Jill M. Lyon
Joyce & Jacobs
2300 M Street, N.W.
Suite 130
Washington, D.C. 20037
Attorneys for CelPage, Inc.,
Network USA, Denton Enterprises
Copeland Communications and
Electronics, Inc., Nationwide
Paging

William J. Franklin, Chartered
1919 Pennsylvania Avenue, N.W.
Suite 300
Washington, D.C. 20006-3404
Attorney for Roamer One, Inc.

JoAnne G. Bloom
Frank Michael Panek
Attorneys for Ameritech
2000 W. Ameritech Center Drive
Hoffman Estates, IL 60195

Philip L. Verveer
Sue D. Blumenfeld
Francis M. Buono
Willkie Farr & Gallagher
1155 21st Street, N.W.
Suite 600
Washington, D.C. 20036-3384

Michael F. Altschul
Cellular Telecommunications
Industry Association
Two Lafayette Centre, Third
Floor
1133 21st Street, N.W.
Washington, D.C. 20036

Edward R. Wholl
Jacqueline E. Holmes Nethersole
Katherine S. Abrams
NYNEX Corporation
120 Bloomingdale Road
White Plains, NY 10605

George Y. Wheeler
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036
Attorney for Telephone and
Data Systems, Inc.

David L. Nace
Lukas, McGowan, Nace &
Gutierrez, Chtd.
1819 H Street, N.W.
Seventh Floor
Washington, D.C. 20006
Attorney for Liberty Cellular
d/b/a Kansas Cellular

David L. Nace
Lukas, McGowan, Nace &
Gutierrez, Chtd.
1819 H Street, N.W.
Seventh Floor
Washington, D.C. 20006
Attorney for Pacific Telecom
Cellular, Inc.

David L. Nace
Marci E. Greenstein
Lukas, McGowan, Nace &
Gutierrez, Chtd.
1819 H Street, N.W.
Seventh Floor
Washington, D.C. 20006
Attorney for Pioneer
Telephone Cooperative, Inc.

Martin T. McCue
Vice President and General
Counsel
Linda Kent, Associate General
Counsel
United States Telephone
Association
900 19th Street, N.W.
Washington, D.C. 20006-2105

Jeffrey S. Bork
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036
Attorney for U.S. West

W. Bruce Hanks
President
Century Cellunet, Inc.
100 Century Park Avenue
Monroe, LA 71203

Linda C. Sadler
Manager, Governmental Affairs
Rockwell International Corp.
1745 Jefferson Davis Highway
Arlington, VA 22202

Michael J. Shortley, III
Attorney for Rochester
Telephone Corporation
180 South Clinton Avenue
Rochester, NY 14646

Rodney L. Joyce
Ginsburg, Feldman and Bress
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036
Attorney for In-Flight Phone
Corp.

William J. Gordon
V.P. Regulatory Affairs
In-Flight Phone Corp.
1146 19th Street, N.W.
Suite 200
Washington, D.C. 20036

William J. Cowan
General Counsel
New York State Department
of Public Service
Three Empire State Plaza
Albany, NY 12223

David L. Jones, Chairman
Government and Industry Affairs
Committee
Rural Cellular Association
2120 L Street N.W.
Suite 810
Washington, D.C. 20037

Gail L. Polivy
GTE
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Alan R. Shark, President
American Mobile
Telecommunications Association,
Inc.
1835 K Street, N.W., Suite 203
Washington, D.C. 20006

Elizabeth R. Sachs, Esq.
Lukas, McGowan, Nace &
Gutierrez
1819 H Street, N.W.
Suite 700
Washington, D.C. 20006

Mary Brooner
Manager, Regulatory Relations
Motorola, Inc.
1350 I Street, N.W.
Washington, D.C. 20005

Michael D. Kennedy, Director
Regulatory Relations
Motorola, Inc.
1350 I Street, N.W., Suite 400
Washington, D.C. 20005

Judith St. Ledger-Roty
Marla Spindel
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036
Attorneys for Paging Network,
Inc.

James P. Tuthill
Betsy S. Granger
Pacific Bell and Nevada Bell
140 New Montgomery St.
Room 1525
San Francisco, CA 94105

James L. Wurtz
Pacific Bell and Nevada Bell
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Ashton R. Hardy
Bradford D. Carey
Majorie R. Esman
Hardy & Carey, L.L.P.
111 Veterans Boulevard
Suite 225
Metairie, LA 70005

Judith St. Ledger-Roty
J. Laurent Scharff
Matthew J. Harthun
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

Robert B. Kelly
Douglas L. Povich
Kelly, Hunter, Mow &
Povich, P.C.
1133 Connecticut Ave, N.W.
Washington, D.C. 20036
Attorney for Advanced
Mobilecomm Technologies,
Inc., Digital Spread Spectrum
Technologies, Inc.

G.A. Gorman
President and General Manager
North Pittsburgh Telephone
Company
4008 Gibsonia Road
Gibsonia, PA 15044-9311

Terrence P. McGarty
President
The Telmarc Group, Inc., and
Chairman,
Telmarc Telecommunications,
Inc.
24 Woodbine Road
Florham Park, NJ 07932

Paul Rodgers, General Counsel
Charles D. Gray, Assistant
General Counsel
James Bradford Ramsay, Deputy
Assistant General Counsel
National Association of
Regulatory Utility
Commissioners
1102 ICC Building
Post Office Box 684
Washington, D.C. 20044

John M. Goodman, Esq.
Bell Atlantic
1710 H Street, N.W.
Washington, D.C. 20006

William L. Roughton, Jr., Esq.
Vice President and General
Counsel
Bell Atlantic Personal
Communications, Inc.
1310 N. Courthouse Road
Arlington, VA 22201

S. Mark Tuller, Esq.
Vice President and General
Counsel
Bell Atlantic Mobile
Systems, Inc.
180 Washington Valley Road
Bedminster, NJ 07921

John T. Scott, III
Crowell & Moring
1001 Pennsylvania Ave, N.W.
Washington, D.C.
Attorney for Bell Atlantic Co.

Jeffrey L. Sheldon
Sean A. Stokes
Utilities Telecommunications
Council
1140 Connecticut Avenue, N.W.
Suite 1140
Washington, D.C. 20036

Carl W. Northrop
Bryan Cave
Suite 700
700 13th Street, N.W.
Washington, D.C. 20005

Jay C. Keithley
Leon M. Kestenbaum
Sprint Corporation
1850 M Street, N.W.
Suite 1100
Washington, D.C. 20036

Stuart F. Feldstein
Robert J. Keller
Steven N. Teplitz
Fleischman and Walsh
1400 Sixteenth Street, N.W.
Suite 600
Washington, D.C. 20036
Attorneys for Time Warner
Telecommunications

Henry M. Rivera
Larry S. Solomon
Jay S. Newman
Ginsburg, Feldman & Bress
Chartered
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036
Attorneys for Metricom, Inc.

Thomas J. Casey
Simone Wu
Timothy R. Robinson
Skadden, Arps, Slate, Meagher
& Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005
Attorneys for New Par

Norman P. Leventhal
Raul R. Rodriguez
Stephen D. Baruch
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006-1809
Counsel for TRW Inc.

Thomas A. Stroup
Mark Golden
Telocator
1019 19th Street, N.W.
Suite 1100
Washington, D.C. 20036

Raul R. Rodriguez
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006
Attorneys for Starsys Global
Positioning, Inc.

Randall B. Lowe
Mary E. Brennan
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, D.C. 20005
Attorneys for Cencall
Communications Corporation

Michael R. Carper, Esq.
General Counsel
CenCall Communications
Corporation
3200 Cherry Creek Drive South
Denver, CO 80110

Henry Goldberg
Joanthan L. Wiener
Daniel S. Goldberg
Goldberg, Godles, Wiener
& Wright
1229 Nineteenth Street, N.W.
Washington, D.C. 20036
Attorneys for Ram Mobile Data
USA Limited Partnership

Bruce D. Jacobs
Glenn S. Richards
Fisher, Wayland, Cooper and
Leader
1255 23rd Street, N.W.
Suite 800
Washington, D.C. 20037
Attorneys for AMSC
Subsidiary Corporation

Lon C. Levin
Vice President
and Regulatory Counsel
AMSC Subsidiary Corporation
10802 Park Ridge Boulevard
Reston, VA 22091

Werner K. Hartenberger
Laura H. Phillips
Dow, Lohnes & Albertson
1255 23rd Street, Suite 500
Washington, D.C. 20037
Attorneys for Cox Enterprises,
Inc.

Albert H. Kramer
David B. Jeppsen
Robert F. Aldrich
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Penthouse Suite
Washington, D.C. 20005
Attorneys for Peoples Telephone
Company

Bruce Renard, Esq.
General Counsel
Peoples Telephone Company
2300 Northwest 89th Place
Miami, Florida 33172

Richard M. Tettelbaum
Louis M. Gurman
Coleen M. Egan
Gurman, Kurtis, Blask &
Freedman, Chartered
1400 16th Street, N.W.
Suite 500
Washington, D.C. 20036
Attorney for Allcity Paging,
Inc., PN Cellular, Inc. and
Its Affiliates, The Illinois
Valley Cellular RSA 2
Partnerships

David E. Weisman, Esquire
Alan S. Tilles, Esquire
Meyer, Faller, Weisman and
Rosenberg, P.C.
4400 Jenifer Street, N.W.
Suite 380
Washington, D.C. 20015
Attorneys for Association of
Business and Educational
Radio, Inc.

William B. Barfield
Jim O. Llewellyn
1155 Peachtree Street, N.E.
Atlanta, GA 30367-6000
BellSouth Corporation
BellSouth Telecommunications,
Inc.
BellSouth Cellular Corp.
Mobile Communications
Corporation of America

Leonard J. Kennedy
Laura H. Phillips
Richard S. Denning
Dow, Lohnes & Albertson
1255 23rd Street, N.W.
Washington, D.C. 20037
Attorneys for Comcast Corp.

R. Gerard Saleme
Senior Vice President of
Federal Affairs
Cathleen A. Massey
Senior Regulatory Counsel
McCaw Cellular Communications,
Inc.
1150 Connecticut Avenue, N.W.
4th Floor
Washington, D.C. 20036

Howard J. Symons
Gregory A. Lewis
Kecia Boney
Mintz, Levin, Cohn, Ferris
Glovsky and Popeo, P.C.
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Robert S. Foosaner, Esq.
Senior Vice President -
Government Affairs
Lawrence R. Krevor, Esq.
Director - Governmental Affairs
NEXTEL Communications, Inc.
601 13th Street, N.W.
Suite 1110 South
Washington, D.C. 20005

Peter Arth, Jr.
Edward W. O'Neill
Ellen S. Levine
Attorneys for the Public
Utilities Commission of the
State of California
505 Van Ness Avenue
San Francisco, CA 94102

John D. Lockton
Managing Partner
Corporate Technology Partners
100 S. Ellsworth Avenue
9th Floor
San Mateo, CA 94401

Daryl L. Avery
General Counsel
Peter G. Wolfe
Staff Counsel
The Public Service Commission
of the District of Columbia
450 5th Street, N.W.
Washington, D.C. 20001

David A. Reams
President and General Counsel
Grand Broadcasting Corporation
P.O. Box 502
Perrysburg, OH 43552
James D. Ellis
William H. Free
Paula J. Fulks
175 E. Houston
Room 1218
San Antonio, TX 78205
Attorneys for Southwestern
Bell Corporation

Wayne Watts
Linda M. Hood
17330 Preston Rd, Suite 100A
Dallas, TX 75252
Attorneys for Southwestern Bell
Mobile Systems, Inc.

David L. Hill
Audrey P. Rasmussen
O'Connor & Hannan
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, D.C. 20006
Attorneys for Independent
Cellular Network, Inc.